

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

MAGED F. NESHEIWAT,

Plaintiff,

v.

Civil No. 3:12-cv-00075-JRS

LEASE FINANCE GROUP, LLC,  
NORTHERN LEASING SYSTEMS, INC.,

Defendants.

**DEFENDANTS' MEMORANDUM IN SUPPORT OF MOTION FOR LEAVE TO  
AMEND ANSWER**

Defendants Lease Finance Group, LLC and Northern Leasing Systems, Inc., by counsel,  
hereby state as follows for their Memorandum in Support of Motion for Leave to Amend  
Answer.

**FACTS**

1. Defendants filed their Answer on April 5, 2012. (Dkt. #13.)
2. Defendants now seek to amend their Answer to admit certain items that they did not admit in their initial Answer and to revise certain paragraphs under the heading "Affirmative Defenses" in their initial Answer.
3. A proposed Agreed Order granting Defendants' Motion for Leave to Amend Answer has been endorsed by counsel and will be presented to the Court for entry. A copy of the endorsed proposed Agreed Order is attached as Exhibit 1 to this Memorandum.

**ARGUMENT**

A party may amend its pleadings with the written consent of the opposing party or by leave of court – "[t]he court should freely give leave when justice so requires." Fed. R. Civ. P. 15(a)(2). Counsel for Plaintiff has endorsed the proposed Agreed Order granting Defendants

leave to file an Amended Answer within seven (7) days of the Court entering the proposed Agreed Order.

In light of Plaintiff's written consent, the Court should grant Defendants' Motion for Leave to Amend and enter the proposed Agreed Order.

**CONCLUSION**

WHEREFORE, Defendants request that the Court grant Defendants' Motion for Leave to Amend Answer and enter the Agreed Order upon its presentation to the Court.

Respectfully submitted,

/s/  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 2<sup>nd</sup> day of May, 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to counsel of record registered to use the CM/ECF system in this action, as follows:

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/s/\_\_\_\_\_  
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